

EXHIBIT 2

Re: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Hughes, John

Tue 8/28/2018 11:51 PM

To: Michaels, Jessica A. <JMichaels@mayerbrown.com>; Hastert, Ethan A. <EHastert@mayerbrown.com>; FW-CLIENT-CDK-MDL-Team <CDK-MDL-Team@mayerbrown.com>;

Cc: DMSTeam <DMSTeam@milberg.com>; Ho, Derek T. <dho@kelloggghansen.com>; Nemelka, Michael N. <mnemelka@kelloggghansen.com>; Rudofsky, Benjamin L. <brudofsky@kelloggghansen.com>; Bronson, Kent <kbronson@milberg.com>; Provance, Matthew D. <MProvance@mayerbrown.com>;

 3 attachments (1 MB)

CDK Search Terms to Dealer Plaintiffs_(Dealer Plaintiffs' Counter proposal 8.28.18).pdf; CDK Search Terms to Dealer Plaintiffs_(Dealer Plaintiffs' Counter proposal 8.28.18).docx; 2018-8-28 J. Hughes Ltr to J. Michaels Re Dlr Search Terms .pdf;

Jessica,

Please find the attached correspondence and counter-proposals.

John

John Hughes
Attorney at Law*
Milberg Tadler Phillips Grossman LLP
One Pennsylvania Plaza, Suite 1920
New York, NY 10119
T: 212.594.5300
F: 212.868.1229
Jhughes@milberg.com

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From: Michaels, Jessica A. <JMichaels@mayerbrown.com>
Sent: Monday, August 27, 2018 11:57:51 PM
To: Hughes, John; Hastert, Ethan A.; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.; Bronson, Kent; Provance, Matthew D.
Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

John –

Please see the attached correspondence.

Jessica

Jessica A. Michaels
Associate, Litigation
Mayer Brown LLP

[Tel:+1-312-701-7121](tel:+1-312-701-7121)

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jmichaels@mayerbrown.com

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From: Hughes, John [mailto:jhughes@milberg.com]

Sent: Monday, August 27, 2018 11:14 AM

To: Hastert, Ethan A.; Michaels, Jessica A.; FW-CLIENT-CDK-MDL-Team

Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.; Bronson, Kent; Provance, Matthew D.

Subject: Re: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Ethan,

We are available at 1:30 pm EST to discuss. If that time isn't a possibility, 4:30 pm is also an option.

We can use this call-in

1(888) 337-0215

Passcode: 7772426

Thanks much,

John

John Hughes

Attorney at Law*

Milberg Tadler Phillips Grossman LLP

One Pennsylvania Plaza, Suite 1920

New York, NY 10119

T: 212.594.5300

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From: Hastert, Ethan A. <EHastert@mayerbrown.com>

Sent: Monday, August 27, 2018 11:27:02 AM

To: Hughes, John; Michaels, Jessica A.; FW-CLIENT-CDK-MDL-Team

Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.; Bronson, Kent; Provance, Matthew D.

Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

John,

Are you available this afternoon to meet and confer on CDK's proposed search terms to Dealership Plaintiffs? If so, please suggest a time. Thank you.

Best,

Ethan

Ethan A. Hastert

Mayer Brown LLP
Tel: +1-312-701-7656
Fax: +1-312-706-8368
ehastert@mayerbrown.com
71 South Wacker Drive
Chicago, Illinois 60606-4637

From: Hughes, John [mailto:jhughes@milberg.com]
Sent: Friday, August 24, 2018 2:52 PM
To: Michaels, Jessica A.; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.; Bronson, Kent
Subject: Re: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Jessica and Ethan,

Please find the attached correspondence and search term modifications in pdf and word.

Best,
John

John Hughes
Attorney at Law*
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New York, NY 10119
T: 212.594.5300
F: 212.868.1229
Jhughes@milberg.com

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From: Michaels, Jessica A. <JMichaels@mayerbrown.com>
Sent: Wednesday, August 22, 2018 4:01:48 PM
To: Hughes, John; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.; Bronson, Kent
Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

John –

As discussed during our meet-and-confer this afternoon, please find CDK's response to Dealership Plaintiffs' proposed search term revisions.

Best,
Jessica

From: Hughes, John [mailto:jhughes@milberg.com]
Sent: Tuesday, August 21, 2018 3:49 PM
To: Michaels, Jessica A.; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.; Bronson, Kent
Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Jessica –

We are available at 2pm Central/3pm Eastern and can use the call in below.

Phone: 1.888.337.0215

Passcode: 7772426

Thanks,
John

From: Michaels, Jessica A. [mailto:JMichaels@mayerbrown.com]
Sent: Tuesday, August 21, 2018 4:31 PM
To: Hughes, John; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.
Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

John –

I think our emails may have just crossed. Let me know if either of the proposed times work for your team. We are available tomorrow between 2 PM and 4 PM Central or Thursday at 1:30 PM Central.

Jessica

From: Hughes, John [mailto:jhughes@milberg.com]
Sent: Tuesday, August 21, 2018 3:29 PM
To: Michaels, Jessica A.; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.
Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Jessica,

We have not heard a response from our August 17 email below. We remain open to discuss the search term proposals and are generally available tomorrow for a meet and confer.

Thank you,

John Hughes
Attorney at Law*
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communication in error, please erase all copies of the message and its attachments and notify sender immediately. Thank You.

From: Hughes, John
Sent: Friday, August 17, 2018 1:28 PM
To: Michaels, Jessica A.; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.
Subject: Re: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Jessica,

We agree that whatever search terms the parties agree to now will be run across the entire eventual collections for all Dealership Plaintiff Custodians.

After running the search terms proposed in our August 11 letter against 4 additional custodians, our search term proposal remains the same. The lone exception is an alteration to #46 which applies a more generous proximity modifier in order to correct a technical issue. A hit report reflecting the additional collections is attached to this email.

We hope these representations will allow CDK to engage in negotiations. If you are willing to engage in a meet and confer on the proposed modifications, we suggest a call at 2:00 PM Eastern on Monday, August 20.

Thank you,

John Hughes
Attorney at Law*
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From: Michaels, Jessica A. <JMichaels@mayerbrown.com>
Sent: Wednesday, August 15, 2018 11:38 AM
To: Hughes, John; FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.
Subject: RE: DMS. CDK Search terms to Dealership Plaintiffs Proposal

John –
We received your letter and proposed modifications over the weekend. We appreciate the hit counts and proposed modifications from your side—which is, as we have previously expressed, a step in the right direction. As you can imagine, our concern is that the Dealers have only collected and tested the search terms on ESI from two out of 28 agreed-upon custodians. Terms that could appear “burdensome” or “overbroad” for just two custodians may return

reasonable results when applied to all 28 custodians. But more importantly, we are hesitant to negotiate and, assuming we can do so, agree upon search terms at this juncture only to potentially be told we need to renegotiate some or all of those terms once the ESI from remaining custodians is collected and tested. Thus, we need to understand whether plaintiffs are proposing to agree that whatever terms we might agree to now will be run across all the custodians' ESI, as is—*i.e.*, regardless of the number of hits that a given term might generate when run against the entire population. If that is not your proposal, then we are not sure it would be productive to respond with a counter-proposal to your proposed modifications (a number of which we disagree with) until more data has been collected and tested—and your letter gives no indication of when that might be.

As previously stated, we remain open to engaging in productive meet-and-confer efforts while the filed motions to compel are pending in a good-faith effort to find some common ground on this issue. Our offer to do so, of course, is without prejudice to the issues and arguments we raised in our motion to compel, which we do not believe are addressed by the Dealers' August 11 letter.

Regards,
Jessica

From: Hughes, John [mailto:jhughes@milberg.com]
Sent: Saturday, August 11, 2018 11:20 AM
To: FW-CLIENT-CDK-MDL-Team
Cc: DMSTeam; Ho, Derek T.; Nemelka, Michael N.; Rudofsky, Benjamin L.
Subject: DMS. CDK Search terms to Dealership Plaintiffs Proposal

Counsel,

please see the attached correspondence and search terms proposals.

Thank you,

John Hughes
Attorney at Law*
Milberg Tadler Phillips Grossman LLP
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MILBERG TADLER PHILLIPS GROSSMAN^{LLP}

John D. Hughes
(212)594-5300
jhughes@milberg.com

August 28, 2018

VIA EMAIL

Jessica A. Michaels, Esq.
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
JMichaels@mayerbrown.com

Re: *In re Dealer Management Systems Antitrust Litig.*,
MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Jessica:

I write in response to CDK's letter of August 27, 2018 regarding CDK's proposed search terms to Dealership Class Plaintiffs.

We have included a table containing an additional counter-proposal on behalf of Dealership Class Plaintiffs. This counter-proposal offers our own modifications where hit counts are still burdensome, and/or are not reasonably connected to the subject matter of this litigation but also accepts many of your proposed modifications in compromise. Several proposals from your August 27, 2018 list were found to have either syntax errors or to exceed the 450-character limitation of our system. We have proposed modifications for these as well.

You are correct to note that Dealership Plaintiffs have been actively collecting documents from custodians during the course of negotiations, as we made clear would be the case in correspondence prior to the filing of your Motion to Compel. Our collection and the associated hit counts from proposed modifications dated August 24, 2018 forward are based on the documents of 13 document custodians (Dale Batson, Mark Johnson, Robert Degregoris, Ronnie Eames, Heather Pauliks, Frank Lupachino, Andy Strong, Eric Strong, Tom Hessert, Michelle Condo, Tom Stever, Chris Schanrock, and Kevin Winningham). As requested, the "all-in" number of total documents plus family members responsive to those custodians ESI in total for our counter-proposal of August 24, 2018 is approximately 20,000 and 33,000 respectively. It is not currently feasible to offer a precise figure as the calculation of documents responsive to

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Jessica A. Michaels

August 11, 2018

Page 2

CDK's proposed term 135a-k could not be combined into any single hit report as it requires the exclusion of each set of custodians pertaining to each of the dealership plaintiffs from the total collection. CDK's August 27, 2018 proposals total approximately 49,000 unique document hits and 75,000 documents with family, include several syntax errors and are subject to the same limitation with respect to precision based on term 135a-k. Finally, the total documents from Dealership Class Plaintiffs' August 28, 2018 proposal is approximately 27,000 unique document hits and 44,000 documents with family.

In the interest of transparency, and as you are also already aware, these totals do not reflect all of Dealership Plaintiffs' agreed custodians. Hit counts however, have been offered in good faith to establish the relative burden of search terms proposed by CDK, despite reflecting numbers that are expected to rise in the course of collection.

CC: Derek T. Ho
Michael Nemelka
Benjamin Rudofsky

Sincerely,

/s/ John D. Hughes
John D. Hughes

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No. 001	((social security) OR SSN OR (driver* w/3 license*)) AND (DMS OR platform OR system)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No. 002	(CDK OR Reynolds OR DMS OR or system) AND (script* OR program OR executable OR bypass OR avoid OR (work w/5 around) OR (break w/5 (through OR down)) OR evade)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.003	InDesign or IDD	103	384	Term is accepted	103	384	We are in agreement on this term.											
No.004	"17-cv-07827" or "17-cv-00864" or "2:17-cv-11975" or "3:18-cv-00029" or "2:18-cv-00042-GMB" or "2:17-cv-00896-DSF-AFM" or "18-cv-00833" or "3:17-cv-00888-HSO-JCG" or "1:18-cv-01402" or "2:17-cv-08714" or "1:18-cv-01707" or "1:18-cv-02666" or "3:17-cv-00318-wmc" or "1:18-cv-02521" or "1:18-cv-00996" or "1:18-cv-00909" or "1:18-cv-00846" or "3:17-cv-00925" or "1:18-cv-00987"	21	41	Term is accepted	21	41	We are in agreement on this term.											
No.005	"Data Authorization"	67	147	Term is accepted	67	147	We are in agreement on this term.											
No.006	"Dealer Management System" w/5 market	24	50	Term is accepted	24	50	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs' 8.28.2018 Proposal

No	CDK's Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.007	"Digital Motorworks" or Integralink or DMI or "Digit Motor Works"	360	620	("Digital Motorworks" or Integralink or DMI or "Digit Motor Works") w/10 Integration			CDK does not think this term is overly broad as originally drafted by CDK.			Term is accepted as originally proposed			We are in agreement on this term.					
No.008	(Dms function*) w/20 (CDK or Reynolds or Dealertrack or Cox)	3	14	Term is accepted	3	14	We are in agreement on this term.											
No.009	(Dms menu*) w/20 (CDK or Reynolds or Dealertrack or Cox)	3	7	Term is accepted	3	7	We are in agreement on this term.											
No.010	"ERA link" or ERAlink or "ERA Ignite" or "ERA-Ignite" or "Era Access" or ERAccess or ERAccess	717	901	Term is accepted	717	901	We are in agreement on this term.											
No.011	"Integrated Document Solutions"	5	9	Term is accepted	5	9	We are in agreement on this term.											
No.012	"MDL 2817" or "In re Dealer Management Systems Antitrust Litigation"	76	143	Term is accepted	76	143	We are in agreement on this term.											
No.013	"Motor Vehicle Software Corporation" or MVSC	22	41	Term is accepted	22	41	We are in agreement on this term.											
No.014	"New Freedom"	30	93	Term is accepted	30	93	We are in agreement on this term.											
No.015	"nonpublic personal information" OR NPI						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.016	"personally identifiable information" OR PII						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.017	"Proprietary Data"						CDK did not move to compel on this term. We agree to delete this term.											
No.018	"Query Builder" or (QB AND Reynolds)	9	23	Term is accepted	9	23	We are in agreement on this term.											
No.019	"Reynolds Certified Interface" or RCI or 3PA or "third party access" or "security first" or securityfirst or "third-party access"	1,621	2,384	"Reynolds Certified Interface" or RCI or 3PA or ("security first" w/10 CDK) or securityfirst	1,377	2,025	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			In the spirit of compromise, dealership plaintiffs will accept this term as originally drafted		
No.020	"secure web form"						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.021	"sensitive personal information"						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.022	"User Emulation"						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.023	("Report Generator" or "report scheduler") AND (schedule or automat*)	114	244	Term is accepted	114	244	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.024	((CDK OR Reynolds) w/20 DMS) AND data AND available AND (poll* OR pulled* OR scrape* OR extract* OR integrat*) AND (field* OR element*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.025	((code w/4 box) OR "code-on-the-box" or push or writeback or (write w/3 back)) w/20 (CDK OR Reynolds OR RR* OR R&R OR Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate OR DMS OR "dealer management system" OR Dealeartra* OR “Dealer track” OR “dealer trak” OR Opentrack OR “Open Track”)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.026	((data w/5 transfer) OR push OR pull OR writeback OR (write w/2 back) or "write back") AND (protocol* or polic)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.027	(hostile or foreign or unauthorized or independent or “third party” or thirdparty or “3 rd party” or Authenticom or DealerVault or SIS or SelectQu or SelectQ or “Superior Integrated Solutions” or SIS or Dominion or StoneEagle or ProQuotes) w/10 (access* or integra* or *extract)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.028	(los* or win* or gain* or churn* or defect* or cancel* or (turn* w/3 over) or turnover or switch or chang* or mov*) w/15 (sale or business or contract or customer or vendor or integrator or DMS or "dealer management system")	22,878	42,399	(los* or win* or gain* or churn* or defect* or cancel* or (turn* w/3 over) or turnover or switch) w/5 (vendor or integrator or DMS or "dealer management system") AND (Contract or agreement)			CDK 8/22 Proposal: (los* or win* or gain* or churn* or defect* or cancel* or (turn* w/3 over) or turnover or switch or chang* or mov*) w/15 (vendor or integrator or DMS or "dealer management system")	2,113	4,111	(lose or win or gain or churn* or defect* or cancel* or “Turn over” or turnover or switch or change or move) w/5 (vendor or integrator or DMS or "dealer management system")	420	899	CDK requests that Plaintiffs used term modified by CDK on 8/22/18.			Dealer Plaintiffs Accept this term as modified by CDK on 8/22/18		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.029	(pull* OR poll OR push OR writeback OR (write /3 back) OR extract* OR scrap* OR quer* OR obtain) AND data AND (CDK OR Reynolds OR RR* OR R&R OR Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate OR DMS OR "dealer management system" OR Dealeartra* OR “Dealer track” OR “dealer trak” OR Opentrack OR “Open Track”)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.030	((recei* OR stor* OR compil* OR encrypt* OR transmi* OR request OR shar* OR obtain OR gather OR acquir* OR protect* OR utilize* OR use OR maintain* OR email OR send OR access OR secur* OR priva*) w/20 (data)) AND (polic* or practic*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.031	((Rey* or "R&R" or RR or CDK or ADP) w/20 (compar* or better or worse or "no* good" or more or less or close* or open)) AND (DMS or system)	4,327	6,952	((Rey* or "R&R" or RR or CDK or ADP) w/5 ((compar* or better or worse or "no* good" or more or less or close* or open)) AND (DMS or system))	2,545	3,320	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not believe that approximately 7,000 hits with families is overbroad. In the spirit of compromise, however, CDK proposes the following modification: ((Rey* or "R&R" or RR or CDK or ADP) w/15 (compar* or better or worse or "no* good" or more or less or close* or open)) AND (DMS or system)	3,963	6,386	Dealer Plaintiffs stand by their 8/11 proposal as CDK’s proposed 8/27 term hit on nearly as many documents as its original proposed term.		
No.032	((security OR Data) AND (standard* OR rule* OR guid* OR memo* OR report)) AND (NADA OR AIADA OR "National Automobile Dealers Association" OR "American International Automobile Dealers Association")						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.033	((Third w/3 Party) or thirdparty or "3rd party" or OEM or CDK or Reynolds or RR or R&R) w/5 Proprietary	146	477	((Third w/3 Party) or thirdparty or "3rd party" or OEM or CDK or Reynolds or RR or "R&R") w/5 Proprietary	146	477	CDK does not think this term is overly broad as originally drafted by CDK.						CDK accepts term as proposed by Plainitffs on 8/11.			We are in agreement		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.034	((Third w/3 Party) or thirdparty or "3rd party") AND (access* OR poll* OR pull* OR scrap* OR extract*) AND (CDK or Reynolds or RR or R&R or Dealertrack or Cox or DMS or data or "Dealer Management System")						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.035	((unauthorized w/5 access) or (not /5 authoriz*) or ((express or written) w/5 permi*)) AND ((CDK w/5 system) OR (Reynolds w/5 system) OR ((Dealertrack OR Cox) w/5 system) OR DMS OR “Dealer Management System”)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.036a	((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/20 (fee* or pric* or charge or rate* or bill or cost* or pay*)	46,173	81,912	((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/20 (fee* or pric* or charge or rate* or bill or cost* or pay*) w/10 (DMS or "Dealer Management System")			CDK 8/22 Proposal: (((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/20 (fee* or pric* or charge or rate* or bill or cost* or pay*)) AND (DMS or “dealer management system” or data or access or 3PA or RCI or vendor or integrat* or CDK or “R&R” or Rey* or SIS OR SelectQu OR “Superior Integrated Solutions” OR StoneEagle OR ProQuotes OR *@proquotes.net OR *@4-superior.com OR *@stoneeagle.com OR *@selectqu.com or Authenticom)	SPLIT 8/22 Proposed Term: (((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/20 (fee* or pric* or charge or rate* or bill or cost* or pay*)) AND (SIS OR SelectQu OR "Superior Integrated Solutions" OR StoneEagle OR ProQuotes OR *@proquotes.net OR *@4-superior.com OR *@stoneeagle.com OR *@selectqu.com or Authenticom)	767	This term is accepted as split from the original term.			We are in agreement on this term.			We are in agreement regarding Term 36a		
								282										

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.036b								((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/20 (fee* or pric* or charge or rate* or bill or cost* or pay*)) AND (DMS or "dealer management system" or data or access or 3PA or RCI or vendor or integrat* or CDK or "R&R" or Rey*) 20,770	41,057	((up w/3 front) or "up-front" or instal* or month* or recur* or annual or (set w/3 up) or setup) w/5 (fee* or pric* or charge or rate* or bill or cost* or pay*)) w/5 (DMS or "dealer management system" or 3PA or RCI or vendor or integrator or integration or CDK or "R&R" or Rey*)	551	1,340	CDK 8/27 Proposal: (((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/10 (fee* or pric* or charge or rate* or bill or cost* or pay*)) w/20 (DMS or "dealer management system" or data or access or 3PA or RCI or vendor or integrat* or CDK or "R&R" or Rey*)	3,438	7,084	CDK’s 8/27 proposal returns burdensome hit counts, Dealer Plaintiffs propose: (((up w/3 front) or "up-front" or instal* or initial or month* or recur* or annual or (set w/3 up) or setup) w/10 (fee* or pric* or charge or rate* or bill or cost* or pay*)) w/10 (DMS or "dealer management system" or access or 3PA or RCI or vendor or integrat* or CDK or "R&R" or Rey*)	1,486	3,139
No.037	(* .gov) AND (CDK or Reynolds or DMS or Dealertrack or Cox) AND (complain* or investigat* or CID or violat*)	97	297	Term is accepted	97	297	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.038	((*authoriz* or agree* or permi* or allow*) w/10 (integrat* or poll* or scrap* or pull* or extract* or access*)) AND (CDK or Reynolds or Dealertrack or Cox or DMS or "Dealer Management System")	1,635	3,634	((*authoriz* or agree* or permi* or allow*) w/10 (integrat* or poll* or pull* or extract* or access*)) w/10 (CDK or Reynolds or Dealertrack or Cox) AND (DMS or "Dealer Management System")	372	954	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s original proposal returns burdensome hit counts, Dealer Plaintiffs propose: ((*authoriz* or agree* or permi* or allow*) w/5 (integrat* or poll* or scrap* or pull* or extract* or access*)) w/25 (CDK or Reynolds or Dealertrack or Cox or DMS or "Dealer Management System")	767	1,587
No.039	(*settle* or assign*) AND (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or "multi district")	8,198	19,674	(*settle* or assign*) AND (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or "multi district") AND Antitrust w/10 (DMS or "Dealer Management System")			CDK 8/22 Proposal: (*settle* or assign*) AND (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or "multi district") AND (antitrust or DMS or “dealer management system” or CDK or Rey*)	1,214	4,469	(*settle* or assign*) w/20 (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or "multi district") w/20 (antitrust or DMS or “dealer management system” or CDK or Rey*)	104	195	CDK requests that Plaintiffs used term modified by CDK on 8/22/18.			The 8/22/18 is overbroad as drafted due to its use of AND connectors. (*settle* or assign*) w/25 (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or "multi district") w/25 (antitrust or DMS or “dealer management system” or CDK or Rey*)	125	222
No.040	("Civil Investigative Demand" or CID) AND (CDK or Reynolds)	897	1,313	Term is accepted	897	1,313	We are in agreement on this term.											
No.041	("Data element*" or "data field*") w/20 ((CDK or Reynolds) w/10 DMS)	19	124	Term is accepted	19	124	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.042	("tilt the table" or (tilt w/3 table)) AND (CDK or DMI or "Digital Motorworks" or "Digital Motor works" or Integralink or RR or "R&R" or "Reynolds" or "security first" or "securityfirst" or "3PA Refresh" or "Partner Program")	2	5	Term is accepted	2	5	We are in agreement on this term.											
No.043	(audit OR report OR assessment OR analysis) AND data AND (privacy OR security)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.044	(Authoriz* or access or stor* or Secur*) AND (DMS or "Dealer Management System" or Password or login or credential* or username or pwd or (user w/5 ID) or data) AND (Polic* or practice)	11,881	21,884	((Authoriz* or access or stor* or Secur*) AND (DMS or "Dealer Management System") AND (Password or login or credential* or username or pwd or (user w/5 ID) or data)) w/35 (Polic* or practice)			CDK 8/22 Proposal: (Authoriz* or access or stor* or Secur*) w/25 (DMS or "Dealer Management System" or Password or login or credential* or username or pwd or (user w/5 ID) or data) AND (Polic* or practice)	4,681	9,129	(Authoriz* or access or stor* or Secur*) AND (DMS or "Dealer Management System") AND (Password or login or credential* or username or pwd or (user w/5 ID) or data) w/35 (Polic* or practice)	551	953	CDK 8/27 Proposal: (Authoriz* or access or stor* or Secur*) w/20 (DMS or "Dealer Management System" or Password or login or credential* or username or pwd or (user w/5 ID) or data) AND (Polic* or practice)	4,333	8,365	CDK’s 8/27 Proposal produces burdensome hit counts. Dealer Plaintiffs stand by their 8/24/2018 proposal.		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.045	(Autosoft or "PB Financial Systems" or "Applied Computer Systems" or ACS or "Supreme Software" or Dealeartra* or "Dealer track" or "dealer trak" or Opentrack or "Open Track") AND (certif* or agree* or integrat* or contract)	690	2,796	(Autosoft or "PB Financial Systems" or "Applied Computer Systems" or ACS or "Supreme Software" or Dealeartra* or "Dealer track" or "dealer trak" or Opentrack or "Open Track") w/20 (certif* or agree* or integrat* or contract)	206	1,651	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			In the interest of compromise, Dealer Plaintiffs will agree to CDK’s original term as drafted.		
No.046	(BOD or "Board of Directors" or shareholder or investor) AND (minutes or notes or present*)	3,243	7,142	(BOD or "Board of Directors" or shareholder or investor) AND (minutes or notes or present*) w/10 (DMS or "Dealer Management System")			CDK does not think this term is overly broad as originally drafted by CDK.			(BOD or "Board of Directors" or shareholder or investor) AND (minutes or notes or present*) w/35 (DMS or "Dealer Management System")	5	10	CDK 8/27 Proposal: (BOD or "Board of Directors" or shareholder or investor) AND (minutes or notes or present*) AND (CDK or Rey* or DMS or “dealer management system” or Authenticom or Cox or AutoLoop or MVSC or “motor vehicle software” or integrat* or (app* w/5 provid*))	804	3,479	Dealer plaintiffs will agree to CDK’s 8/27/2018 proposal		
No.047	(breach or hack or attack or data) AND (target or "north korea" or Sony or "Community Health" or Equifax or Facebook or DealerBuilt or "New Hampshire"))						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.048	(CDK AND (rey* or "R&R" or RR or Reynolds)) AND ("data exchange agreement" or DEA)	38	152	Term is accepted	38	152	We are in agreement on this term.											
No.049	(CDK and (Reynolds or "R&R" or RR)) AND (coordinat or conspir or anticompet* or antitrust or tying or tie or tort*)	240	498	Term is accepted	240	498	We are in agreement on this term.											
No.050	(CDK or DMI or "Digital Motorworks" or "Digital Motor Works" or Integralink or 3PA or "Partner Program" or "Access Program") w/10 (agree* or contract)	1,398	2,380	(DMI or "Digital Motorworks" or "Digital Motor Works" or Integralink or 3PA or "Access Program") w/10 (agree* or contract)	165	368	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			In the interest of compromise, Dealer Plaintiffs will agree to CDK’s original term as drafted.		
No.051	(CDK or Drive) AND ((manual report*) or (operational report*) or ERPG or (Enhanced Report Generator))	65	139	Term is accepted	65	139	We are in agreement on this term.											
No.052	(CDK OR Reynolds OR "R&R" OR "RR" OR DMS OR "Dealer Management System") AND ((UUP OR admin*) /20 (user OR account OR password or pwd OR access or credential*))						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.053	(CDK or Reynolds or R&R or RR or DMS or "Dealer Management System" or Cox or DealerTrack) AND (Block* or detect* or disabl* or restrict* or intercept* or (cut w/3 off) or prevent* or undermin* or damage* or disarm or impair or cripple or defus* or hamper or impeded* or restrain* or circumscribe or (shut w/5 off) or (turn w/5 off))	5,660	13,091	(CDK or Reynolds or "R&R" or RR or DMS or "Dealer Management System" or Cox or DealerTrack) w/10 (Block* or detect* or disabl* or restrict* or intercept* or (cut w/3 off) or prevent* or undermin* or damage* or disarm or impair or cripple or defus* or hamper or impeded* or restrain* or circumscribe)	971	2,339	CDK does not think this term is overly broad as originally drafted by CDK.						CDK 8/27/2018 Proposal: (CDK or Reynolds or R&R or RR or DMS or "Dealer Management System" or Cox or DealerTrack) w/20 (Block* or detect* or disabl* or restrict* or intercept* or (cut w/3 off) or prevent* or undermin* or damage* or disarm or impair or cripple or defus* or hamper or impeded* or restrain* or circumscribe or (shut w/5 off) or (turn w/5 off))	1,336	4,083	Dealer Plaintiffs would compromise on a W/10 modifier: (CDK or Reynolds or R&R or RR or DMS or "Dealer Management System" or Cox or DealerTrack) w/10 (Block* or detect* or disabl* or restrict* or intercept* or (cut w/3 off) or prevent* or undermin* or damage* or disarm or impair or cripple or defus* or hamper or impeded* or restrain* or circumscribe or (shut w/5 off) or (turn w/5 off))	977	2,345
No.054	(CDK or Reynolds or RR or R&R or ADP) w/20 (injur* or damage* or harm* or hurt*)	296	1,316	(CDK or Reynolds or RR or "R&R" or ADP) w/10 (injur* or damage* or harm* or hurt*)	211	1,126	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			In the interest of compromise, Dealer Plaintiffs will agree to CDK’s original term as drafted.		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.055a (Term 55 was initially greater than 450 characters)	(CDK OR Reynolds OR RR* OR R&R OR Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate OR DMS OR "dealer management system" OR Dealeartra* OR “Dealer track” OR “dealer trak” OR Opentrack OR “Open Track”) AND (SIS OR SelectQu OR “Superior Integrated Solutions” OR StoneEagle OR ProQuotes OR *@proquotes.net OR *@4-superior.com OR *@stoneeagle.com OR *@selectqu.com)	338	904	(CDK or Reynolds or RR* or "R&R" or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate or DMS or "dealer management system" or Dealeartra* or "Dealer track" or "dealer trak" or Opentrack or "Open Track") AND (SIS or SelectQu or "Superior Integrated Solutions" or StoneEagle or ProQuotes or *@proquotes.net or *@4-superior.com or *@stoneeagle.com or *@selectqu.com)	338	904	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK. Based on conversation during 8/27 meet-and-confer, we believe we are in agreement on this term.			We are in agreement as to Term 55a		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018	
No. 055b	(CDK OR Reynolds OR RR* OR R&R OR Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate OR DMS OR "dealer management system" OR Dealeartra* OR “Dealer track” OR “dealer trak” OR Opentrack OR “Open Track”) AND (((Independent w/20 (data w/3 integrator*)) OR (Independent integrator))	0	0	(CDK or Reynolds or RR* or "R&R" or Autosoft or Dealerbuilt or PBS or Dominion or "Adam Systems" or Quorum or Advent or DPC or Automate or DMS or "dealer management system" or Dealeartra* or “Dealer track” or “dealer trak” or Opentrack or “Open Track”) AND (Independent w/5 (integrat* or data))			CDK does not think this term is overly broad as originally drafted by CDK. However, it appears there was a syntax error. Please provide hit counts for the following term: (CDK OR Reynolds OR RR* OR R&R OR Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate OR DMS OR "dealer management system" OR Dealeartra* OR “Dealer track” OR “dealer trak” OR Opentrack OR “Open Track”) AND ((Independent w/20 (data w/3 integrator*)) OR (Independent integrator))	19	45	This term is accepted as proposed			We are in agreement on this term.				We are in agreement as to 55b		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.056	(CDK OR Reynolds OR RR* OR R&R OR Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or Automate OR DMS OR system OR Dealeartra* OR “Dealer track” OR “dealer trak” OR Opentrack OR “Open Track”) w/20 (perform* or threat* or break or slow* or breach or destroy OR degrad* OR (data w/10 (corrupt* OR integrity)) OR (data w/10 security) OR complain* or investigat*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.057	(cede or (give w/3 up) or ((hand or sign or turn) w/3 over) or relinquish or renounce) AND (control or power or authority) AND (data or system)	7,999	18,225	(cede or (give w/3 up) or ((hand or sign or turn) w/3 over) or relinquish or renounce) w/10 (control or power or authority) AND (data or system) AND DMS			CDK 8/22 Proposal: (cede or (give w/3 up) or ((hand or sign or turn) w/3 over) or relinquish or renounce) w/20 (control or power or authority) AND (data or system or DMS)	1,331	4,702	(cede or (give w/3 up) or ((hand or sign or turn) w/3 over) or relinquish or renounce) w/10 (control or power or authority) AND (data or system) AND DMS	173	428	CDK requests that Plaintiffs used term modified by CDK on 8/22/18.			Dealer plaintiffs offer to compromise by adding a W/20 limiter to our 8/24 proposal (cede or (give w/3 up) or ((hand or sign or turn) w/3 over) or relinquish or renounce) w/20 (control or power or authority) AND (data or system) AND DMS	197	478

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.058	(compet* or threat* or challeng* or loss or lose or losing or superior* or compar*) w/15 (DMS or Drive or Dash or ODE or integrat* or app* or solution* or product or service)	14,195	27,793	(compet* or threat* or challeng* or loss or lose or losing or superior* or compar*) w/15 (DMS or (CDK w/2 Drive) or (CDK w/2 Dash) or ODE or integrat*)			CDK 8/22 Proposal: (compet* or threat* or challeng* or loss or lose or losing or superior* or compar*) w/15 (DMS or (CDK w/5 Drive) or (CDK w/5 Dash) or ODE or integrat* or app* or solution*)	10,069	19,899	(compet* or threat* or challeng* or loss or lose or losing or superior* or compar*) w/15 (DMS or (CDK w/2 Drive) or (CDK w/2 Dash) or ODE or integrat*)	695	1,460	CDK 8/27 Proposal: (compet* or threat* or challeng* or loss or lose or losing or superior* or compar*) w/15 (DMS or (CDK w/5 Drive) or (CDK w/5 Dash) or ODE or integrat* or (app* w/5 provid*))	823	1,846	Dealer Plaintiffs will agree to CDK’s 8/27 proposal		
No.059	(Compet* w/20 harm*)						CDK did not move to compel. We agree to delete this term.											
No.060	(contract* or agree*) AND (term or year* or length or period)	31,049	56,498	(contract* or agree*) w/10 (term or year* or length or period) AND (CDK or Reynolds)			CDK 8/22 Proposal: (contract* or agree*) AND (term or year* or length or period) AND (CDK or Rey*)	3,893	8,641	(contract* or agree*) w/10 (term or year* or length or period) AND (CDK or Reynolds)	855	3,309	CDK 8/27 Proposal: (contract* or agree*) w/20 (term or year* or length or period) AND (CDK or Rey*)	1,141	4,597	Dealer Plaintiffs will agree to CDK’s 8/27 proposal		
No.061	(data or system OR DMS) w/20 (breach or attack or steal or stolen or hack* or corrupt* OR cybersec* OR (cyber w/5 secur*))						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.062	(data w/3 integrat*) or (data w/3 extract*)	3,245	4,536	(data w/3 integrat*) or (data w/3 extract*)) w/10 (CDK or Reynolds)	418	776	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			Dealer Plaintiffs would compromise on (data w/3 integrat*) or (data w/3 extract*) AND (CDK or REYNOLDS)	2,489	3,267

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.063	(data AND integration) w/20 market	52	127	(data AND integration) w/20 market	52	127	CDK does not think this term is overly broad as originally drafted by CDK.			This term is accepted.			We are in agreement on this term.					
No.064	(data or access or "third party" or thirdparty or "3rd party" or integrat* or extract*) AND (policy* or guideline* or rule* or requir*)	36,187	59,601	(data or access or "third party" or thirdparty or "3rd party") w/10 (integrat* or extract*) w/10 (policy* or guideline* or rule* or requir*)			CDK 8/22 Proposal: (data or access or "third party" or thirdparty or "3rd party" or integrat* or extract*) w/20 (policy* or guideline* or rule* or requir*)	9,609	19,342	(data or access or "third party" or thirdparty or "3rd party") w/15 (integrat* or extract*) w/15 (policy* or guideline* or rule* or requir*)	216	472	CDK 8/27 Proposal: (data or access or "third party" or thirdparty or "3rd party" or integrat* or extract*) w/10 (policy* or guideline* or rule* or requir*)	6,682	13,919	Dealer Plaintiffs would compromise on (data or access or "third party" or thirdparty or "3rd party") w/20 (integrat* or extract*) w/20 (policy* or guideline* or rule* or requir*)	271	641
No.065	(dealer w/10 data) AND (retriev* or obtain or access* or collect* or transmit* or poll* or scrap* or pull* or extract*) AND (manual or push or FTP)	271	912	Term is accepted	271	912	We are in agreement on this term.											
No.066	((declin* or refus* or ((will or would) /3 not) or won't) w/10 (authoriz* or grant or give or allow or share)) AND (login or credential or password or pwd or access) AND (Cox OR DealerTrack or DMS OR Reynolds OR R&R OR RR OR CDK or integrat* or Authenticom or DealerVault or vendor*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.067	(DMS or "dealer management system" or integrat* or app* or vendor or CDK or Reynolds or Dealertrack or Cox) AND (analy* or forecast or project* or survey* or evaluat* or stud* or (market w/3 share) or (market w/3 condition*) or profit* or compet* or market or pric*)	72,287	109,539	(DMS or "dealer management system") W/5 (analy* or forecast or project* or survey* or evaluat* or stud* or (market w/3 share) or (market w/3 condition*) or profit* or compet* or market or pric*)			CDK 8/22 Proposal: (DMS or "dealer management system" or integrat* or app* or vendor or CDK or Reynolds or Dealertrack or Cox) w/15 (survey* or evaluat* or stud* or (market w/3 share) or (market w/3 condition*) or compet* or market or pric*)	20,639	36,815	(DMS or "dealer management system" or integrator or CDK or Reynolds or Dealertrack or Cox) w/5 (survey* or evaluat* or stud* or (market w/3 share) or (market w/3 condition*) or compet*)	878	1,304	CDK 8/27 Proposal: (DMS or "dealer management system" or integrat* or (app* w/5 provid*) or vendor or CDK or Reynolds or Dealertrack or Cox) w/10 (survey* or evaluat* or stud* or (market w/3 share) or (market w/3 condition*) or compet* or market)	Syntax Error	Syntax Error	Dealer Plaintiffs stand by their 8/24 proposal		
No.068	(DMS or "dealer management system") w/5 market*	353	593	Term is accepted	353	593	We are in agreement on this term.											
No.069	(DMS or "Dealer Management System") AND (promot* or rebate* or discount* or sale*)	4,462	7,640	(DMS or "Dealer Management System") w/10 (promot* or rebate* or discount* or sale*)	753	1,815	CDK does not think this term is overly broad as originally drafted by CDK.						CDK 8/27 Proposal: (DMS or "Dealer Management System") w/20 (promot* or rebate* or discount* or sale*)	1,098	2,436	Dealer Plaintiffs will agree to CDK’s 8/27 proposal		
No.070	(DMS or "Dealer Management System") w/10 (agree* or contract)	454	1,136	Term is accepted	454	1,136	We are in agreement on this term.											
No.071	(DMS or integrat* or vendor*) w/10 cancel	79	218	Term is accepted	79	218	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.072	(draft or modify or edit or write or chang* or negotiat* or enforc* or interpret* or adjust* or tweak or delete or amend*) AND (contract* or agree* or provision* or section* or paragraph)	40,197	66,778	((draft or modify or edit or write or chang* or negotiat* or enforc* or interpret* or adjust* or tweak or delete or amend*) AND (contract* or agree* or provision* or section* or paragraph)) w/10 (DMS or "Dealer Management System")			CDK 8/22 Proposal: (draft or modify or edit or write or chang* or negotiat* or enforc* or interpret* or adjust* or tweak or delete or amend*) AND (contract* or agree* or provision* or section* or paragraph) AND (DMS or “dealer management system” or CDK or Rey*)	6,482	12,481	(draft or modify or edit or write or chang* or negotiat* or enforc* or interpret* or adjust* or tweak or delete or amend*) w/10 (contract* or agree* or provision* or section* or paragraph) w/10 (DMS or “dealer management system” or CDK or Rey*)	301	703	CDK requests that Plaintiffs use term modified by CDK on 8/22/18.			The hit counts for CDK’s 8/22 appear to be in error, they are corrected here and are overburdensome. Dealer Plaintiffs propose (draft or modify or edit or write or chang* or negotiat* or enforc* or interpret* or adjust* or tweak or delete or amend*) w/20 (contract* or agree* or provision* or section* or paragraph) w/10 (DMS or “dealer management system” or CDK or Rey*)	529	1,169
No.073	(employee or agent*) AND (agree* or contract) AND ((permit or allow or access or autoriz*) w/25 DMS)	344	953	Term is accepted	344	953	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.074	(exclusiv* or sole or only) w/20 (DMS or CDK or Reynolds or R&R or RR or provider or service* or "dealer management system")	2,547	5,914	(exclusiv* or sole or only) w/10 (DMS or CDK or Reynolds or "R&R" or RR or "dealer management system")	225	582	CDK does not think this term is overly broad as originally drafted by CDK.						CDK 8/27 Proposal: (exclusiv* or sole or only) w/15 (DMS or CDK or Reynolds or R&R or RR or provider or service* or "dealer management system")	2,082	4,836	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs propose (exclusiv* or sole or only) w/5 (DMS or CDK or Reynolds or R&R or RR or provider or service* or "dealer management system")	936	2,063
No.075	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice or quot*) w/15 (data w/5 (gather* or extract* or (write w/3 back) or pull* or poll* or scrap* or integrat*))	711	1,281	(fee or pric* or charge or rate* or bill or cost* or pay* or invoice or quot*) w/10 (data w/5 (gather* or extract* or (write w/3 back) or pull* or poll* or integrat*))	428	875	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.					
No.076	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice or quot*) w/15 (DealerVault or Authenticom or Integrat* or vendor* or (data w/5 (gather* or extract* or (write w/3 back) or pull* or poll* or scrap*)))	6,345	14,421	(fee or pric* or charge or rate* or bill or cost* or pay* or invoice or quot*) w/10 (DealerVault or Authenticom or (data w/5 (gather* or extract* or (write w/3 back) or poll*)))			CDK 8/22 Proposal: (fee* or pric* or charge or rate* or bill or pay* or invoice or quot*) w/15 (DealerVault or Authenticom or Integrat* or app* or (data w/5 (gather* or extract* or "write back" or writeback or pull* or poll* or scrap*)))	40,284	68,517	(fee or fees or pric* or charge or rate* or bill or pay* or invoice or quot*) w/5 (DealerVault or Authenticom or Integrat* or (data w/5 (extract* or "write back" or writeback or poll* or scrap*)))	1,151	2,379	CDK 8/27 Proposal: (fee* or pric* or charge or rate* or bill or pay* or invoice or quot*) w/15 (DealerVault or Authenticom or Integrat* or (app* w/5 provid*) or (data w/5 (gather* or extract* or "write back" or writeback or pull* or poll* or scrap*)))	3,582	6,694	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs stand by their 8/24 proposal		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.077	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) AND (Digital Motorworks or Integralink or DMI or "Digit Motor Works")	279	506	Term is accepted	279	506	We are in agreement on this term.											
No.078	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/15 (Rey* or "R&R" or RR or Cox or DealerTrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/5 (system or DMS)) or Quorum or Advent or DPC or RCI or "certified interface" or DealerVault or Authenticom or "Auto/mate" or Automate or "auto mate" or SelectQu or "SelectQ" or "Superior Integrated Solutions" or SIS or StoneEagle or ProQuotes or AutoLoop)	6,729	11,701	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/5 (Rey* or "R&R" or RR or Cox or DealerTrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/5 (system or DMS)) or Quorum or Advent or DPC or RCI or "certified interface" or DealerVault or Authenticom or "Auto/mate" or Automate or "auto mate" or SelectQu or "SelectQ" or "Superior Integrated Solutions" or SIS or StoneEagle or ProQuotes or AutoLoop)	5,026	8,665	CDK does not think this term is overly broad as originally drafted by CDK.						CDK accepts Pls. 8/11 proposal.					
No.079a	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/20 (data or access* or integrat* or 3PA or "third party access" or "partner program" or "Access Program")	24,100	42,848	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/5 (3PA or "third party access" or "Access Program")			CDK 8/22 Proposal: (fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/10 (data or 3PA or "third party access" or "partner program" or "Access Program")	8,383	16,881	(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/10 (3PA or "third party access" or "partner program" or "Access Program")	561	765	CDK 8/27 Proposal: (fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/10 (or 3PA or "third party access" or "partner program" or "Access Program")			Dealership Plaintiffs accept 79a 79a. (fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/10 (3PA or "third party access" or "partner program" or "Access Program")	580	793

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
79b.													(fee* or pric* or charge or rate* or bill or cost* or pay* or invoice) w/5 (data)	5,231	11,161	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs propose	988	2,217
No.080	(fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) AND ((pass w/5 through) or passthrough or shared or sent or "passed to" or "passed on" or "pass on")	187,201	238,327	(fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) AND ((pass w/5 through) or passthrough or shared or "passed to" or "passed on" or "pass on") w/35 (DMS or 3PA)			CDK 8/22 Proposal: (fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/20 ((pass w/5 through) or passthrough or shared or "passed to" or "passed on" or "pass on")	5,047	10,220	(fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) AND ((pass w/5 through) or passthrough or shared or "passed to" or "passed on" or "pass on") w/35 (DMS or 3PA)	323	513	CDK 8/27 Proposal: ((fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/20 ((pass w/5 through) or passthrough or shared or "passed to" or "passed on" or "pass on")) AND (CDK or Rey* or 3PA or “third party” or “access program” or RCI or integrat* or application or data or DMS or “dealer management system” or extract or poll or pull or push or “write back” or writeback)	2,335	5,188	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs propose ((fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/20 ("pass through" or passthrough or shared or "passed to" or "passed on" or "pass on")) w/25 (CDK or Rey* or 3PA or “third party” or “access program” or RCI or integrat* or application or data or DMS or “dealer management system” or extract or poll or pull or push or “write back” or writeback)	418	1,065

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.081	(fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/20 (vend* or integrat* or appl* or Authenticom or SIS or "Superior Integrated Solutions" or InDesign or 1DMS or SelectQu or "New Freedom" or "Stone Eagle" or "ProQuotes")	29,669	54,575	(fee or pric* or charge or rate* or bill or cost* or pay* or paid or invoice*) w/5 (integrator or Integration or Authenticom or SIS or "Superior Integrated Solutions" or InDesign or 1DMS or SelectQu or "Stone Eagle" or "ProQuotes")			CDK 8/22 Proposal: (fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/10 (vend* or integration* or integrator* or appl* or Authenticom or SIS or "Superior Integrated Solutions" or InDesign or 1DMS or SelectQu or "New Freedom" or "Stone Eagle" or "ProQuotes")	22,275	42,691	(fee or fees or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/5 (vendor or integration* or integrator* or Authenticom or SIS or "Superior Integrated Solutions" or InDesign or 1DMS or SelectQu or "New Freedom" or "Stone Eagle" or "ProQuotes")	2,093	4,505	CDK 8/27 Proposal: (fee* or pric* or charge* or rate* or bill or cost* or pay* or paid or invoice*) w/10 (vend* or integration* or integrator* or (app* w/5 provid*) or Authenticom or SIS or "Superior Integrated Solutions" or InDesign or 1DMS or SelectQu or "New Freedom" or "Stone Eagle" or "ProQuotes")	4,883	11,888	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs stand by their 8/24 proposal		
No.082	(FTP OR “File transfer protocol”) AND (push or writeback or (write w/5 back))						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.083	(Gramm-Leach-Bliley) OR (Gramm Leach Bliley) OR GLB OR GLBA						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.084	(hack or steal or misuse or misapprop*) w/20 (data or server or information or password or pwd or login or credentials or access OR DMS)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.085	(harm OR injur* OR disrupt* OR los* OR interrupt* OR cancel* OR end* OR stop*) w/15 (Reynolds OR R&R OR RR OR CDK)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.086	(Integrat* or vendor or application or app* or customer* or DMS or "dealer management system") w/10 (win or loss or switch)	4,865	9,994	(Integrat* or vendor or application or DMS or "dealer management system") w/5 (win or loss or switch)			CDK 8/22 Proposal: (Integrat* or vendor or application or app* or DMS or "dealer management system") w/10 (win or loss or switch)	3,984	8,084	(Integrat* or vendor or application or DMS or "dealer management system") w/5 (win or loss or switch)	293	713	CDK 8/27 Proposal: (Integrat* or vendor or application or (app* w/5 provid*) or DMS or "dealer management system") w/10 (win or loss or switch)			Dealer Plaintiffs will accept CDK’s 8/27 proposal		
No.087	Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or subpoena or "class plaintiff" or "lead plaintiff" or "class representative"	35,762	60,290	(Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or subpoena or "class plaintiff" or "lead plaintiff" or "class representative") w/10 (DMS or "Dealer Management system")			CDK 8/22 Proposal: (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or subpoena or "class plaintiff" or "lead plaintiff" or "class representative") AND (CDK or Rey* or DMS or “Dealer Management System” or Cox or AutoLoop or MVSC or Authenticom)	4,600	10,174	(Lawsuit or litigat* or alleg* or (legal w/3 (action or proceeding)) or MDL or subpoena or "class plaintiff" or "lead plaintiff" or "class representative") w/5 (CDK or Rey* or DMS or “Dealer Management System” or Cox or AutoLoop or MVSC or Authenticom)	1,021	2,384	CDK 8/27 Proposal: (Lawsuit or litigat* or complaint or alleg* or claim* or (legal w/3 (action or proceeding)) or MDL or subpoena or "class plaintiff" or "lead plaintiff" or "class representative") w/20 (CDK or Rey* or DMS or “Dealer Management System” or Cox or AutoLoop or MVSC or Authenticom)	1,454	3,335	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs stand by their 8/24 proposal		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.088	(Login OR username OR "user name" OR password OR credential* or pwd or (user w/5 ID)) AND (recei* OR stor* OR compil* OR encrypt* OR transmi* OR request OR shar* OR obtain OR gather OR acquir* OR protect OR utilize* OR use OR maintain* OR email OR send OR stor* or access)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.089	(login OR username OR “user name” OR password OR credential* OR pwd OR (user w/5 ID)) w/15 (“Reynolds OR R&R OR RR OR CDK OR DMS)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.090	(PII or (non w/3 dealer) OR (proprietary data) OR SSN or "social security" or "nonpublic personal" OR "personally identifiable") AND (DMS OR "Dealer Management System") AND (access* OR poll* OR pull* OR scrap* OR extract*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.091	(purchase or buy or sale or aquire or acquisition) AND (DMS or "dealer management system")	2,403	5,076	(purchase or buy or sale or aquire or acquisition) w/5 (DMS or "dealer management system")	164	589	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			This term produces burdensome hit counts as originally drafted, Dealer Plaintiffs would compromise on: (purchase or buy or sale or aquire or acquisition) w/20 (DMS or "dealer management system")	405	1,231
No.092	(R&R) or RR or Rey* or *reyrey.com or Reynolds	13,111	26,590	(*reyrey.com or Reynolds) w/5 (DMS or "Dealer Management System")			CDK 8/22 Proposal: ((R&R) or RR or Rey* or *reyrey.com or Reynolds) AND (DMS or "Dealer Management System" or data or access* or integrat* or CDK)	7,210	15,261	((R&R) or RR or Rey* or *reyrey.com or Reynolds) w/10 (DMS or "Dealer Management System" or integrat* or CDK)	865	1,458	CDK 8/27 Proposal: ((R&R) or RR or Rey* or *reyrey.com or Reynolds) w/20 (DMS or "Dealer Management System" or data or access* or integrat* or CDK)	1,614	4,942	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs stand by their 8/24 proposal	865	1,458
No.093	(restrict* or *authoriz* or allow*) AND (Reynolds or CDK) AND (DMS or system) AND (contract or agree*)	2,154	5,322	(restrict* or *authoriz* or allow*) w/5 (Reynolds or CDK) w/5 (DMS or system) AND (contract or agree*)	41	93	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			This term produces burdensome hit counts as originally drafted, Dealer Plaintiffs would compromise on: (restrict* or *authoriz* or allow*) w/20 (Reynolds or CDK) w/20 (DMS or system) AND (contract or agree*)	257	740

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.094	(Reynolds or RR or R&R or DMS or CDK or Dealertrack or Cox or system) AND ("processing loads" or burden or effects)	1,184	2,820	(Reynolds or RR or "R&R" or DMS or CDK or Dealertrack or Cox) w/5 ("processing loads" or burden)	10	30	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			This term produces burdensome hit counts as originally drafted, Dealer Plaintiffs would compromise on: (Reynolds or RR or "R&R" or DMS or CDK or Dealertrack or Cox) w/25 ("processing loads" or burden)	19	57
No.095	(secur* or priva*) AND data AND (concern* or worr* or anxi* OR distress* or nervous* or uneas* or trouble*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.096	(Secur* w/10 (data or information)) AND (polic* OR plan OR system)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.097	(Stone Eagle Group) or StoneEagle or *@stoneeagle.com	166	389	Term is accepted	166	389	We are in agreement on this term.											
No.098	(Superior Integrated Solutions) or SIS or *@4-superior.com	411	1,243	Term is accepted	411	1,243	We are in agreement on this term.											
No.099	(Unauthorized OR (without authoriz*) OR (no* w/5 authoriz*)) AND (DMS OR "Dealer Management System" OR CDK OR Reynolds)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.100	(unauthorized w/5 access) w/20 (data OR server OR information)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.101	(Username OR Password OR userID OR (user w/5 ID)) AND DMS						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.102a (Term 102 was initially greater than 450 characters)	(win or los*) w/20 (DMS or "dealer management system" OR CDK OR Rey* or “R&R” or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or “certified interface” or DealerVault or Authenticom or “Auto/mate” or Automate or “Auto Mate” or SelectQu or SelectQ or “Superior Integrated Solutions” or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	1,106	3,772	(win or los*) w/5 (DMS or "dealer management system" or CDK or Rey* or "R&R" or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or "certified interface" or DealerVault or Authenticom or "Auto/mate" or Automate or "Auto Mate" or SelectQu or SelectQ or "Superior Integrated Solutions" or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	282	607	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s original proposed term 102 produces burdensome hit counts of at least 12k with family for 102a-e, Dealer Plaintiffs stand by their 8/24 proposals for each		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.102b	(cancel* or switch) w/20 (DMS or "dealer management system" OR CDK OR Rey* or “R&R” or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or “certified interface” or DealerVault or Authenticom or “Auto/mate” or Automate or “Auto Mate” or SelectQu or SelectQ or “Superior Integrated Solutions” or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	2,847	3,745	(cancel* or switch) w/5 (DMS or "dealer management system" or CDK or Rey* or "R&R" or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or "certified interface" or DealerVault or Authenticom or "Auto/mate" or Automate or "Auto Mate" or SelectQu or SelectQ or "Superior Integrated Solutions" or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	1,948	2,538	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s original proposed term 102 produces burdensome hit counts of at least 12k with family for 102a-e, Dealer Plaintiffs stand by their 8/24 proposals for each		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.102c	(defect* or mov*) w/20 (DMS or "dealer management system" OR CDK OR Rey* or “R&R” or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or “certified interface” or DealerVault or Authenticom or “Auto/mate” or Automate or “Auto Mate” or SelectQu or SelectQ or “Superior Integrated Solutions” or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	1,437	2,645	(defect* or mov*) w/5 (DMS or "dealer management system" or CDK or Rey* or "R&R" or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or "certified interface" or DealerVault or Authenticom or "Auto/mate" or Automate or "Auto Mate" or SelectQu or SelectQ or "Superior Integrated Solutions" or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	413	848	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s original proposed term 102 produces burdensome hit counts of at least 12k with family for 102a-e, Dealer Plaintiffs stand by their 8/24 proposals for each		
No.102d	(chang* or transfer*) w/20 (DealerVault or Authenticom or “Auto/mate” or Automate or “Auto Mate” or SelectQu or SelectQ or “Superior Integrated Solutions” or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	1,194	2,450	(chang* or transfer*) w/5 (DealerVault or Authenticom or "Auto/mate" or Automate or "Auto Mate" or SelectQu or SelectQ or "Superior Integrated Solutions" or SIS or StoneEagle or ProQuotes or AutoLoop or vendor or integrat*)	247	574	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s original proposed term 102 produces burdensome hit counts of at least 12k with family for 102a-e, Dealer Plaintiffs stand by their 8/24 proposals for each		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.102e	(chang* or transfer*) w/20 (DMS or "dealer management system" OR CDK OR Rey* or “R&R” or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or “certified interface”)	3,710	6,637	(chang* or transfer*) w/5 (DMS or "dealer management system" or CDK or Rey* or "R&R" or RR or Cox or Dealertrack or Autosoft or Dealerbuilt or PBS or Dominion or (Adam w/15 (system or DMS)) or Quorum or Advent or DPC or RCI or "certified interface")	1,346	3,077	CDK does not think this term is overly broad as originally drafted by CDK.						CDK accepts Pls. 8/11 proposed modification.			CDK’s original proposed term 102 produces burdensome hit counts of at least 12k with family for 102a-e, Dealer Plaintiffs stand by their 8/24 proposals for each		
No.103	“secure web form”						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.104	“SOC” OR SSAE OR cybersec* OR hack* OR (breach* AND (data or system))						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.105	agen*						CDK did not move to compel. We agree to delete this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.106	Agreement w/20 (CDK or Reynolds or R&R or illegal or anticompet* or alleg*)	1,996	4,991	Agreement w/5 ((CDK or Reynolds or "R&R") AND (illegal or anticompet* or alleg*))	34	100	CDK does not think this term is overly broad as originally drafted by CDK.						CDK 8/27 Proposal: Agreement w/15 (CDK or Reynolds or R&R or illegal or anticompet* or alleg*)	1,406	3,721	CDK’s 8/27 proposal produces burdensome hit counts. So that the concepts remain connected, Dealer Plaintiffs propose: Agreement w/20 ((CDK or Reynolds or "R&R") AND (illegal or anticompet* or alleg*))	71	242
No.107	anticompet*	86	185	anticompet*	86	185	CDK does not think this term is overly broad as originally drafted by CDK.						CDK accepts Pls. 8/11 proposed modification.			We are in agreement		
No.108	antitrust	1,227	1,618	Antitrust AND (DMS or "Dealer Management System")	913	1,077	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s 8/27 proposal produces burdensome hit counts. So that the concepts remain connected, Dealer Plaintiffs stand by their 8/11 proposal		
No.109	Authenticom or DealerVault or Cottrell or Dvault or ACOM or DVLТ or DVT or Cotrel or Cottrel or Cotrell or AuthentiLink or 17-cv-318	1,374	2,036	(Authenticom or DealerVault or Cottrell or Dvault or ACOM or DVLТ or DVT or Cotrel or Cottrel or Cotrell or AuthentiLink) w/10 (17-cv-318 or antitrust)	42	50	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			In the spirit of compromise, Dealer Plaintiffs will accept the term as originally drafted, despite the fact that it is 12 distinct searches as drafted		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.110	Authoriz* AND ((Reynolds OR CDK) w/20 DMS)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.111	AutoLoop or (loop w/3 llc) or *Autoloop.net or 18-cv-02521	156	244	(AutoLoop or (loop w/3 llc) or *Autoloop.net) w/10 (18-cv-02521 or antitrust)	9	23	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			Dealer Plaintiffs will accept this term as originally drafted.		
No.112	Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime or 17-cv-925	9,243	14,631	(Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime) w/10 (17-cv-925 or antitrust)	2	5	CDK agrees to delete this term, as it is duplicative of No. 117.											
No.113	CDK or ADP or *cdk.com or *adp.com	24,138	30,638	(*cdk.com or *adp.com) w/10 (DMS or "Dealer management system")			CDK 8/22 Proposal: (CDK or ADP or *cdk.com or *adp.com) AND (DMS or "Dealer Management System" or data or access* or integrat* or Rey* or RR or “R&R”)	10,668	16,142	(ADP or *cdk.com or *adp.com) w/10 (DMS or "Dealer Management System" or integrat* or Rey* or RR or “R&R”)	944	3,118	CDK 8/27 Proposal: (CDK or ADP or *cdk.com or *adp.com) w/20 (DMS or "Dealer Management System" or data or access* or integrat* or Rey* or RR or “R&R”)	6,437	10,514	CDK’s 8/27 proposal produces burdensome hit counts, Dealer Plaintiffs will compromise on: (CDK or ADP or *cdk.com or *adp.com) w/10 (DMS or "Dealer Management System" or access* or integrat* or Rey* or RR or “R&R”)	4,317	7,567

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.114	CDK* AND (nondisclosure* or share* or provide*) AND (fee* or charge*)	2,124	3,804	As a result of larger than expected hit counts, Dealer Plaintiffs propose: CDK w/35 ((nondisclosure* or share* or provide*) w/10 (fee or charge*))	133	378	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			CDK’s original proposal does produce burdensome hit counts, Dealer Plaintiffs will compromise on: CDK w/35 ((nondisclosure* or share* or provide*) AND (fee or charge*))	479	1,026
No.115	Circumvent AND (security OR dms OR block*						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.116a	Conspir* or monopol* or (market w/2 alloc*) or (market w/2 division) or "exclusive dealing" or "tying arrangement" or boycott* or anticompetitive or "single brand aftermarket" or antitrust or "refusal to deal" or duopoly or dominat* or "market power" or "lock in" or "locked in" or "barriers to entry" or "barrier to entry" or tort*	9,569	20,224	(Conspir* or monopol* or (market w/2 alloc*) or (market w/2 division) or "exclusive dealing" or "tying arrangement" or boycott* or anticompetitive or "single brand aftermarket" or antitrust or "refusal to deal" or duopoly or dominat* or "market power" or "lock in" or "locked in" or "barriers to entry" or "barrier to entry" or tort*) w/35 (DMS or "Dealer Management System")			CDK 8/22 Proposal: (Conspir* or monopol* or (market w/2 alloc*) or (market w/2 division) or "exclusive dealing" or "tying arrangement" or boycott* or anticompetitive or "single brand aftermarket" or antitrust or "refusal to deal" or duopoly or dominat* or "market power" or "lock in" or "locked in" or "barriers to entry" or "barrier to entry" or tort*) AND (CDK or Rey* or RR or “R&R” or data or DMS or “dealer management system” or integrat* or app* or vend*)	7,631	17,267	(Conspir* or monopol* or (market w/2 alloc*) or (market w/2 division) or "exclusive dealing" or "tying arrangement" or boycott* or anticompetitive or "single brand aftermarket" or antitrust or "refusal to deal" or duopoly or "market power" or "lock in" or "locked in" or "barriers to entry" or "barrier to entry" or tort*) w/20 (CDK or Rey* or RR or “R&R” or data or DMS or “dealer management system” or integrat*)	977	1,189	CDK 8/27 Proposal: (Conspir* or monopol* or (market w/2 alloc*) or (market w/2 division) or "exclusive dealing" or "tying arrangement" or boycott* or anticompetitive or "single brand aftermarket" or antitrust or "refusal to deal" or duopoly or dominat* or "market power" or "lock in" or "locked in" or "barriers to entry" or "barrier to entry" or tort*) w/20 (CDK or Rey* or RR or “R&R” or data or DMS or “dealer management system” or integrat* or (app* w/ provid) or vend*)			CDK’s 8/27 proposal was longer than 450 characters and must be split apart - and would accept 116a with a w/10 modifier below (Conspir* or monopol* or (market w/2 alloc*) or (market w/2 division) or "exclusive dealing" or "tying arrangement" or boycott* or "single brand aftermarket" or antitrust or "refusal to deal" or duopoly or dominat* or "market power" or "lock in" or "locked in" or "barriers to entry" or "barrier to entry" or tort*) w/10 (CDK or Rey* or RR or “R&R” or data or DMS or “dealer management system” or integrat* or (app* w/ provid) or vend*)	1,190	2,110

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs' 8.28.2018 Proposal

No	CDK's Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
116b.																Dealer Plaintiffs would accept 116b: anticompetitive w/20 (CDK or Rey* or RR or "R&R" or data or DMS or "dealer management system" or integrat* or (app* w/ provid) or vend*)	77	160
No.117	Cox or Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime or 17-cv-925	11,465	18,609	(Cox or Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime) w/10 (17-cv-925 or antitrust)			CDK 8/22 Proposal: (Cox or Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime)AND (17-cv-925 or litigat* or antitrust or law* or MDL)	2,515	5,832	(Cox or Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime)w/20 (17-cv-925 or litigat* or antitrust or law* or MDL)	147	236	CDK requests that Plaintiffs use term modified by CDK on 8/22/18.			CDK's 8/22 term produces burdensome hit counts, Dealership plaintiffs propose: (Cox or Autotrader or "Dealer Dot Com" or DealerTrack or "Dealer Track" or HomeNet or "Kelley Blue Book" or vAuto or VinSolutions or Xtime) w/25 (17-cv-925 or litigat* or antitrust or law* or MDL)	264	547
No.118	cyber w/5 insurance						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.119	Disable						CDK did not move to compel on this term. We agree to delete this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.120	FTC or DOJ or "federal trade commission" or "department of justice" or *ftc.gov or *doj.gov	2,203	3,956	(FTC or DOJ or "federal trade commission" or "department of justice" or *ftc.gov or *doj.gov) AND DMS	167	338	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			The term as originally drafted is not connected to the subject matter of this litigation – Dealer Plaintiffs propose: (FTC or DOJ or "federal trade commission" or "department of justice" or *ftc.gov or *doj.gov) AND (CDK or Rey* or RR or “R&R” or data or DMS or “dealer management system” or integrat* or (app* w/ provid) or vend*)	1,002	1,973
No.121	FTP w/3 push						CDK did not move to compel on this term. We agree to delete this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.122	hide or conceal or (cover w/3 up) or veil or bury	11,805	23,219	(hide or conceal or (cover w/3 up) or veil or bury) w/35 (DMS or "Dealer Management System")			CDK 8/22 Proposal: (hide or conceal or (cover w/3 up) or veil or bury) AND (data or integrat* or app* or vend* or litigat* or law* or *legal* or antitrust or CDK or RR or “R&R” or Rey* or DMS or “dealer management system” or hostil* or poll or pull or extract or “write back” or writeback	9,061	19,308	(hide or conceal or (cover w/3 up) or veil or bury) w/5 (integrat* or vend* or litigat* or law* or *legal* or antitrust or CDK or RR or “R&R” or Rey* or DMS or “dealer management system” or hostil* or poll or pull or extract or “write back” or writeback	238	529	CDK 8/27 Proposal: (hide or conceal or (cover w/3 up) or veil or bury) w/20 (data or integrat* or (app* w/5 provid*) or vend* or litigat* or law* or *legal* or antitrust or CDK or RR or “R&R” or Rey* or DMS or “dealer management system” or hostil* or poll or pull or extract or “write back” or writeback)	Syntax error	Syntax error	Dealership Plaintiffs propose the following correcting CDK’s syntax error and also adding a w/10 modifier: (hide or conceal or (cover w/3 up) or veil or bury) w/10 (data or integrat* or "app* provid*" or vend* or litigat* or law* or *legal* or antitrust or CDK or RR or “R&R” or Rey* or DMS or “dealer management system” or hostil* or poll or pull or extract or “write back” or writeback)	713	1,805
No.123	Illegal OR unlawful OR CFAA OR (not w/3 (law* or legal)) OR (against w/3 (law OR contract* OR agree* OR regulat*)) OR (prohibit* w/5 (law OR contract* OR agree* OR regulat*))						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					
No.124	Interfer* w/20 ((CDK or Reynolds) w/20 (DMS or "Dealer Management System"))	13	27	Interfer* w/20 ((CDK or Reynolds) w/20 (DMS or "Dealer Management System"))	13	27	CDK does not think this term is overly broad as originally drafted by CDK.			Term is accepted.			We are in agreement on this term.					
No.125	Lock w/10 account	62	105	Term is accepted	62	105	We are in agreement on this term.											

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.126	manual w/10 (report* or tool* or extract*)	386	1,134	manual w/10 (report* or tool* or extract*) AND (cdk or adp or reynolds or "R&R" or RR or cox)	386	1,134	CDK does not think this term is overly broad as originally drafted by CDK.						CDK does not think this term is overly broad as originally drafted by CDK.			In the spirit of compromise, Dealer Plaintiffs will accept this term as originally drafted		
No.127	Nakedlime or (naked lime)	349	427	Nakedlime or (naked lime)	349	427	CDK does not think this term is overly broad as originally drafted by CDK.			Term is accepted.			We are in agreement on this term.					
No.128	“Non-DMS” or (DMS w/5 alternative)	56	150	“Non-DMS” or (DMS w/5 alternative)	56	150	CDK does not think this term is overly broad as originally drafted by CDK.			Term is accepted.			We are in agreement on this term.					
No.129	OEM AND data	1,413	3,373	OEM w/5 data	174	447	CDK does not think this term is overly broad as originally drafted by CDK.						CDK will accept Pls. 8/11 proposed modification.					
No.130	operational report* or ERPG or "Enhanced Report Generator" or "dynamic report*"	99	153	“operational report*” or ERPG or "Enhanced Report Generator" or "dynamic report*"	99	153	CDK does not think this term is overly broad as originally drafted by CDK.			Term is accepted.			We are in agreement on this term.					
No.131	ProQuotes or (Pro Quotes) or *@proquotes.net	29	87	Term is accepted	29	87	We are in agreement on this term.											
No.132	Pwd OR “Preshared Key” OR PSK OR “Private Key”						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No.133	Schaefer or Strawsburg or (kelly w/2 hall) or Brockman or Gardner or Hellyer or Mccray or reyrey* or Workman or Lamb or Karp or Frey or Crutchfield or Bonifay or Conver or (Steve* w/2 French) or Noser or Thorne or Herbers or Quinlan* or Roeder* or Cottrell	6,645	13,273	"Bob Schaefer" or "Jon Strawsburg" or "Bob Brockman" or "Howard Gardner" or Hellyer or "Dan Mccray" or "Ron Workman" or "Ronald Lamb" or "Robert Karp" or "Ron Frey" or "Dean Crutchfield" or Bonifay or "Leigh Conver" or "Steve French" or "Michael Noser" or "Malcolm Thorne" or "Scott Herbers" or Quinlan* or Roeder* or "Steve Cottrell"			CDK 8/22 Proposal: (Schaefer or Strawsburg or (kelly w/2 hall) or Brockman or Gardner or Hellyer or Mccray or reyrey* or Workman or Lamb or Karp or Frey or Crutchfield or Bonifay or Conver or (Steve* w/2 French) or Noser or Thorne or Herbers or Quinlan* or Roeder* or Cottrell) AND (data or DMS or “dealer management system” or 3PA or RCI or access or app* or integrat* or vend* or litig* or law* or antitrust or compet* or *reyrey* or *adp.com or *cdk.com)	4,390	8,262	(Schaefer or Strawsburg or (kelly w/2 hall) or Brockman or Gardner or Hellyer or Mccray or Workman or Lamb or Karp or Frey or Crutchfield or Bonifay or Conver or (Steve* w/2 French) or Noser or Thorne or Herbers or Quinlan* or Roeder* or Cottrell) w/35 (DMS or “dealer management system” or 3PA or RCI or integrat* or vend* or litig* or law* or antitrust or compet* or *adp.com or *cdk.com)	382	817	CDK 8/27 Proposal: (Schaefer or Strawsburg or (kelly w/2 hall) or Brockman or Gardner or Hellyer or Mccray or reyrey* or Workman or Lamb or Karp or Frey or Crutchfield or Bonifay or Conver or (Steve* w/2 French) or Noser or Thorne or Herbers or Quinlan* or Roeder* or Cottrell) AND (data or DMS or “dealer management system” or 3PA or RCI or access or (app* w/5 provid*) or integrat* or vend* or litig* or law* or antitrust or compet* or *reyrey* or *adp.com or *cdk.com)			CDK’s proposal is over 450 characters and must be split 133a is proposed with a w/35 modifier and removal of w/5 for the “App* provid*” phrase as it returned ~5k documents: 133a (Schaefer or Strawsburg or (kelly w/2 hall) or Brockman or Gardner or Mccray or Workman or Lamb or Karp or Frey or Crutchfield or Bonifay or Conver or (Steve* w/2 French) or Noser or Thorne or Herbers or Quinlan* or Roeder* or Cottrell) w/35 (data or DMS or “dealer management system” or 3PA or RCI or access or “app* provid*” or integrat* or vend* or litig* or law* or antitrust or compet* or *reyrey* or *adp.com or *cdk.com)	598	1,085

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
																133b Hellyer AND (data or DMS or “dealer management system” or 3PA or RCI or access or (app* w/5 provid*) or integrat* or vend* or litig* or law* or antitrust or compet* or *reyrey* or *adp.com or *cdk.com)	15	59
No.134	Secur* w/20 (Audit* OR Standard OR proced*)						CDK requests that Dealership Plaintiffs provide hit counts for this term as originally drafted.						CDK reiterates its request that Dealership Plaintiffs provide hit counts for this term as originally drafted.					

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
No. 135	Waconia OR "Andy Strong" OR "Eric Strong" OR Teterboro OR "Alan Graf" OR Pitre OR "Tom Stever" OR "Kenny Thomas" OR "kelly Thomas" OR "Olathe Toyota" OR "John O'Neil" OR "Johnson Toyota" OR "Kevin Wunningham" OR "Jim Marsh" OR "Allen Yarborough" OR "Mark Grim" OR "David Benstock" OR "Dave Benstock" OR "JCF Auto" OR "JCFAutos" OR Patchogue OR "Stevens Ford" OR "Stevens Jersey City Ford" OR "Jericho Turnpike Sales" OR "Hoover Automotive" OR "Hoover Auto" OR "Cliff Harris" OR "Keith Robers" OR "Warrensburg Ford" OR "Marshall Chrysler" OR "Warrenburg Chrysler" OR “Pensacola Motor” OR "Baystate Ford" OR "Frank Lupacchino" OR "Heather Paulikis" OR "Ronnie Eames" OR Towne OR “FG Downing” OR “Bob Baker” OR “Northtown” OR “Cox Motors” OR “Cox Toyota” OR “Baystate Ford” OR “Bob Tyler” OR “Apex Motor” OR “Shearer Acura” OR “Massey Automotive” OR “Massey Chrysler” OR Hartley						<p>CDK did not move to compel each Dealer whose ESI is being searched to run the term in Search No. 135 that refers to their own name (<i>i.e.</i>, CDK did not move to compel Waconia Dodge to run the term “Waconia”)</p> <p>CDK requests that Dealership Plaintiffs provide hit counts for the term as modified by CDK (<i>i.e.</i>, without running “Waconia” over the Waconia Dodge documents).</p>		45	<p>Dealer Plaintiffs strongly object to this search as it is unlikely to result in documents relevant to this case. It appears to be a backdoor attempt to create an additional 10 search terms from one single search. Nonetheless, We will run the terms as split apart below except as noted.</p>								

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018	
135a										With Exclusion of Waconia Dodge documents: Waconia OR "Andy Strong" OR "Eric Strong" This term is accepted as proposed by Dealer Plaintiffs.	54	188	We are in agreement on this term.					We are in agreement	
135b										With exclusion of Teterboro documents: Teterboro OR "Alan Graf" This term is accepted as proposed by Dealer Plaintiffs.	202	493	We are in agreement on this term.					We are in agreement	
135c										With exclusion of Pitre documents: Pitre OR "Tom Stever" This search is accepted as proposed by Dealer Plaintiffs	97	443	We are in agreement on this term.					We are in agreement	
135d										With exclusion of Olathe Toyota documents: "Kenny Thomas" OR "kelly Thomas" OR "Olathe Toyota" This search is accepted as proposed by Dealer Plaintiffs	78	261	We are in agreement on this term.					We are in agreement	

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
135e										With exclusion of John O’Neil Johnson Toyota documents: "John O'Neil" OR "Johnson Toyota" OR "Kevin Winningham" This term is accepted as proposed by Dealer Plaintiffs	36	95	We are in agreement on this term.				We are in agreement	
135f										With Exclusion of Jim Marsh Documents "Jim Marsh" OR "Allen Yarborough" OR "Mark Grim" This search is accepted as proposed by Dealer Plaintiffs	47	162	We are in agreement on this term.				We are in agreement	

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018	
135g										With exclusion of JCF Auto, Stevens Ford, and Jericho Turnpike Sales documents: "David Benstock" OR "Dave Benstock" OR "JCF Auto" OR "JCFAutos" OR Patchogue OR "Stevens Ford" OR "Stevens Jersey City Ford" OR "Jericho Turnpike Sales" Returns over 2200 hits with family. Dealer Plaintiffs propose the following without Patchogue, which is a village in Long Island, NY: "David Benstock" OR "Dave Benstock" OR "JCF Auto" OR "JCFAutos" OR "Stevens Ford" OR "Stevens Jersey City Ford" OR "Jericho Turnpike Sales"	282	1,578	CDK accepts Pls. proposed modification from 8/24.					We are in agreement	
135h										With exclusion of Hoover Automotive documents: "Hoover Automotive" OR "Hoover Auto" OR “Keith Roberts” This term is accepted as proposed by Dealer Plaintiffs	56	200	We are in agreement on this term.				We are in agreement		

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018
135i										With exclusion of Warrensburg Ford Marshall Chrysler OR Warrenburg Chrysler documents: "Cliff Harris" OR "Warrensburg Ford" OR "Marshall Chrysler" OR "Warrenburg Chrysler" This term is accepted as proposed by Dealer Plaintiffs	267	670	We are in agreement on this term.				We are in agreement	
135j										With exclusion of Baystate Ford documents "Baystate Ford" OR "Frank Lupacchino" OR "Heather Paulikis" OR "Ronnie Eames” This term is accepted as proposed by Dealer plaintiffs	27	119	We are in agreement on this term				We are in agreement	

CDK Proposed Search Terms to Dealership Class Plaintiffs. Dealership Class Plaintiffs’ 8.28.2018 Proposal

No	CDK’s Proposed Terms	CDK Original Proposal Hits 8/24/18	CDK Original Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/11/18	Pls. 8/11/18 Proposal Hits 8/24/18	Pls. 8/11/18 Proposal Hits + Fam 8/24/18	CDK 8/22/2018 PROPOSAL	CDK 8/22/18 Proposal Hits 8/24/18	CDK 8/22/18 Proposal Hits + Fam 8/24/18	Dealer Plaintiffs Proposed Modifications 8/24/18	Pls. 8/24/18 Proposal Hits 8/24/18	Pls. 8/24/18 Proposal Hits + Family 8/24/18	CDK 8/27/2018 Response	CDK 8/27/2018 proposal hits 8/28/2018	CDK 8/27/2018 proposal hits + Family 8/28/2018	Dealership Pls. Counter Proposal 8/28/2018	Dealership Pls. Counter Proposal hits 8/28/2018	Dealership Pls. Counter Proposal hits + family 8/28/2018	
135k										All Dealerships without exclusion. “Pensacola Motor” OR Towne OR “FG Downing” OR “Bob Baker” OR “Northtown” OR “Cox Motors” OR “Cox Toyota” OR “Bob Tyler” OR “Apex Motor” OR “Shearer Acura” OR “Massey Automotive” OR “Massey Chrysler” OR Hartley Returns over 2600 hits with family while no terms that directly link this search to either a named plaintiff of any defendant. Dealer Plaintiffs propose the following: “Pensacola Motor” OR “FG Downing” OR “Bob Baker” OR “Cox Motors” OR “Cox Toyota” OR “Bob Tyler” OR “Apex Motor” OR “Shearer Acura” OR “Massey Automotive” OR “Massey Chrysler” OR Hartley	348	1,246	CDK accepts Pls. proposed modification from 8/24.					We are in agreement	